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7 Attorneys for Jason Nathaniel Bright

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 * * *

11 UNITED STATES OF AMERICA,

2:13-cr-283-JAD-VCF

12 Plaintiff,

13 vs.

STIPULATION TO CONTINUE
SENTENCING HEARING

(First Request)

14 JASON NATHANIEL BRIGHT,

15 Defendant.
16

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico,
20 Assistant Federal Public Defender, counsel for JASON NATHANIEL BRIGHT, that the sentencing
21 hearing scheduled on Tuesday, May 5, 2015 at 11:00 a.m., be vacated and be continued to a date and
22 time convenient to the Court; however, no earlier than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Bright's plea agreement calls for the application of the Safety Valve, if
25 appropriate.

26 2. The parties need additional time to coordinate and thereby determine whether
27 the government is satisfied Mr. Bright has truthfully provided all information concerning the offense.
28 Title 18, United States Code, Section 5C1.2(a)(5).

1 3. The defendant is incarcerated, but has no objections to a continuance of his
2 sentencing hearing for this purpose.

3 4. The additional time requested herein is not sought for purposes of delay.

4 5. Denial of this request for continuance could result in a miscarriage of justice.

5 6. This is the first request for a continuance of the sentencing hearing.

6 DATED this 30th day of April, 2015.

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9 Rene L. Valladares
Federal Public Defender

DANIEL G. BOGDEN,
United States Attorney

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11 /s/ William Carrico
By: _____
William Carrico,
12 Assistant Federal Public Defender

/s/ Susan Cushman
By: _____
Susan Cushman,
13 Assistant United States Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:13-cr-283-JAD-VCF

Plaintiff,

ORDER

vs.

JASON NATHANIEL BRIGHT,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

IT IS THEREFORE ORDERED that the Sentencing currently scheduled for Tuesday, May 5, 2015 at 11:00 a.m., be vacated and continued to Tuesday, June 23, 2015 at 10:00 a.m.

DATED this 30th day of April, 2015.


UNITED STATES DISTRICT JUDGE